





## MONITORING APPENDIX

### Introduction

For each resource, a series of items will be monitored. Each item is evaluated by location, technique for data gathering, unit of measure, and frequency and duration of data gathering. When a duration is not specified, the duration is for the next 20 years. The monitoring plan states the event that will be evaluated and lists the key resources that will be monitored. If an adverse impact can be corrected by a management action within the scope of this plan, the change will be implemented. If the adverse impact can be corrected only by a management action that is outside the scope of this plan the Billings or Powder River Resource Management Plans (RMPs), the management change will be a formal amendment.

The Department of Natural Resources and Conservation (DNRC) Technical Advisory Committee (TAC) for the Powder River Basin Controlled Groundwater Area has proposed a groundwater monitoring plan for coal bed methane (CBM) development. The monitoring recommendations are incorporated into the monitoring table. A complete copy of that plan is at the end of this appendix.

The Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and the State of Montana (state) have developed a wildlife monitoring and protection plan. It is located as an attachment to the Wildlife Appendix.

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Element	Item	Location	Technique	Unit of Measure	Frequency and Duration	Remedial Action Trigger	Management Options
AIR QUALITY	Gaseous and particulate critical air pollutants	area-wide	air quality modeling and ambient air samples	$\mu\text{g}/\text{m}^3$ and parts per million concentrations as ( $\mu\text{g}/\text{m}^3$ )	hourly to 24 hr samples as per standards	predicted or measured exceedances of NAAQS and/or PSD increments by MDEQ	implement additional emission controls or operating limits
	Gaseous and particulate critical air pollutants	Birney/Ashland area	ambient air samples	$\mu\text{g}/\text{m}^3$ and parts per million concentrations as ( $\mu\text{g}/\text{m}^3$ )	hourly to 24 hr samples as per standards	before expanded development activity	implement additional emission controls or operating limits
	Gaseous and particulate critical air pollutants	area-wide	emission inventory	lbs/hr and tons/yr	annually	continuous	require submittal of annual reports
CLIMATE		areas affected by land disturbance	RAWS or COOP Stations	bulk precipitation	daily during the growing season	extremes affecting revegetation operations	
CULTURAL RESOURCES	Area of Critical Environmental Concern (ACECs)	area-wide	site inspection	site, surrounding area	annually	any noticeable trend indicating increased disturbance—natural or human-caused	increase frequency of monitoring to ensure ACEC values are not being impaired
	20% of National Register eligible sites	CBM emphasis area	site inspection	site, surrounding area	annually	impacts to sites from unauthorized uses affecting qualities that make sites eligible for listing on National Register of Historic Places	halt activity affecting eligible sites. Increase monitoring of nearby eligible sites. Evaluate damage to sites.
	random sample of 50 sites	CBM emphasis area	site inspection	site, surrounding area	annually	any noticeable trend indicating increased disturbance—natural or human-caused	increase frequency and number of sites monitored, if sites are being impacted by CBM-related activities. Evaluate damage to sites.

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<b>HYDROLOGY</b>	surface water quality and quantity	area-wide on major rivers or streams where management activities are occurring or expected to occur	standard USGS quantitative measurements of water quality, including but not limited to pH, electric conductivity (EC), water temperature, common ions (Na, Mg, Ca, K, HCO <sub>3</sub> , Cl, SO <sub>4</sub> ), and discharge	standard quantitative measurements of water quality and quantity (i.e., mg/l, °C, µS/cm, cfs)	discharge measurements to be taken daily at designated U.S. Geological Survey locations, including but not limited to the Tongue River at the state line (Decker), Tongue River at Brandenburg bridge (Ashland), Powder River at the state line (Moorhead), and Powder River above Locate. Stream water quality samples will be taken monthly at these stations. This sampling frequency will continue until CBM production ceases.	exceedance of any parameter above the state of MT surface water quality standards, including sodium absorption ratio (SAR), ED, or suspended sediments	report exceedance to MDEQ, who will determine if exceedance is because of natural (low flow) or human causes. If caused by CBM discharge, enforcement action will be taken and/or Montana Pollutant Discharge Elimination System permits modified.

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	groundwater quality and quantity	regional coal seam monitoring wells will be installed on sites 3 to 5 miles from outcrop lines. Monitoring wells also will be required on sites where activities are occurring or expected to occur. Abandoned exploration and CBM wells will be converted to monitoring wells as needed.	coal seam monitoring wells would be finished in coal seams expected to be developed for CBM. Standard USGS quantitative measurements of water quality and quantity would be used, including but not limited to pH, EC, water temperature, common ions (Na, Mg, Ca, K, HCO <sub>3</sub> , Cl, SO <sub>4</sub> ), and depth to water.	standard quantitative measurements of water quality and static water level (mg/l, °C, µS/cm, and feet to water, reported in hundredths of feet)	depth to water measurements will be made monthly for the first 3 years to establish baseline. Measurements will be made quarterly thereafter, unless a greater frequency is determined to be necessary. Water quality samples will be taken quarterly for the first 3 years to establish baseline and annually thereafter, unless a greater frequency is determined to be necessary. Monitoring will continue until at least 95% recovery of static water level has been achieved, or the end of CBM development, whichever is longer.;	a 5-foot decrease in static water level from seasonally adjusted mean static water level (determined during the first 3 years), or a significant shift in water quality from baseline conditions (determined from first 3 years of data) that impacts its beneficial use	if falling water levels are determined to be caused by CBM activity, operators must offer water well mitigation agreements to all landowners with wells in defined drawdown area (5 feet or greater drawdown) of their development. Hydrologic barriers, such as injection wells, may be an option in some cases to prevent drainage of Native American gas and water resources.

Element	Item	Location	Technique	Unit of Measure	Frequency and Duration	Remedial Action Trigger	Management Options
	groundwater quality and quantity	alluvial groundwater would be monitored in stream valleys topographically down gradient from CBM surface discharge points	monitoring wells would be finished in the alluvium. Depth to water measurements and water quality parameters, including but not limited to pH, EC, water temperature, common ions (Na, Mg, Ca, K, HCO <sub>3</sub> , Cl, SO <sub>4</sub> ), and would be obtained.	standard quantitative measurements of water quality and static water level (mg/l, °C, µS/cm, and feet to water, reported in hundredths of feet)	depth to water measurements will be made monthly. Water quality samples will be taken quarterly. Monitoring will continue until at least 95% recovery of static water level has been achieved, or the end of CBM development in that drainage, whichever is longer.	if static groundwater levels are naturally greater than 10 feet below ground surface, a rise in static groundwater levels to 10 feet below ground surface will be the trigger. If natural static groundwater levels are between 10 and 5 feet of the surface, a 2-foot rise in water levels from seasonal baseline levels (determined from the first year of data) will be the trigger. If static groundwater levels are naturally within 5 feet of the surface, a 1-foot rise in water levels from seasonal baseline levels (determined from the first year of data) will be the trigger. A change in groundwater chemistry such that beneficial use of groundwater would be impacted, also will serve as a trigger.	if rises in groundwater levels are determined to result from CBM development, direct discharge of CBM water into waterways in watershed would cease until modified Water Management Plans (WMPs) are submitted and approved
	groundwater quality and quantity	monitoring wells will be installed approximately 300 feet topographically downgradient from infiltration and evaporation impoundments	a nest of monitory wells will be installed with completions just above each aquatard, up to 100 feet total depth, to determine effectiveness of infiltration or if evaporation basins are leaking	depth to water (feet to water reported in hundredths of feet). Water quality samples may be collected as needed.	wells will be gauged monthly. Monitoring will continue at least 95% recovery of static water level has been achieved, or the end of CBM water discharge into the associated basins, whichever is longer.	a rise of 1-foot or more in static water levels above seasonally adjusted mean water levels (determined from the first year of data)	if the rise in water levels is determined to result from CBM activities, operators may be required to install additional monitoring wells further downgradient, or discharge into impoundments may be required to cease until a revised WMP is submitted and approved

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INDIAN TRUST	springs	a network of springs will be identified along coal outcrops in the CBM development area	spring discharge and water quality parameters, including but not limited to pH, EC, water temperature, common ions (Na, Mg, Ca, K, HCO <sub>3</sub> , Cl, SO <sub>4</sub> ), will be determined from existing springs	discharge (cfs), pH, EC (μS/cm), and water temperature (°C) will be determined in the field. Standard quantitative measurements of water quality also will be used (mg/l)	discharge, pH, EC, and water temperature will be determined quarterly. Water samples will be collected for analysis annually.	a 50% decrease in spring discharge below seasonally adjusted mean (determined in the first 3 years), or a significant change in water quality that affects its beneficial use, or a change in the spring ecosystem from functional to nonfunctional	if decreased spring discharges or water quality are determined to result from CBM activity, operators must offer spring mitigation agreements to landowners who use the spring. If impacted spring is identified as important wildlife habitat, adaptive management practices will be used at the landscape level to improve spring ecosystems. Hydrologic barriers, such as injection wells, may be an option in some cases to prevent drainage of Native American gas and water resources.
	groundwater	adjacent to the Northern Cheyenne and Crow reservations	sampling of dedicated monitoring wells in the zones of extraction and zones above and below the expected activity—wells are to be placed in the affected areas to areas unaffected by management activities	standard quantitative measurements of water quality—measurement of depth in feet	field measurements 6 times yearly prior to production activities, continue throughout the activity period and for the duration of 95% of the recovery of pre-development conditions	where site-specific studies show a potential to affect Reservation groundwater, the Tribe would be consulted as to appropriate protection measures and if continuous monitoring shows a drawdown of groundwater that is attributed to CBM production	BLM would require the operators to modify federal CBM production. Mitigation options include reducing production rates, shutting in the well or wells, establishing a hydrologic barrier, or providing compensation to the affected Tribe.
			monitoring wells will be established near the mouth of streams that contain alluvium	measurements of depth in feet	water level measurements will be taken monthly prior to production activity and during the development - water quality measurements will be taken 4 times per year	a 20% rise in the water table above its seasonally adjusted elevation, or a 2 unit increase in the SAR value	Discontinuance of CBM evaporative ponds in that watershed, or require ponds to be lined

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<b>LANDS AND REALTY</b>	natural gas	area-wide	drainage evaluation	radius of drainage	as needed	gas drainage	a communitization agreement, requiring operators to reduce production rates, shut-in wells, change spacing, or establish a hydrologic barrier to protect the Indian minerals from drainage
	rights-of-way	area-wide	site inspection	right-of-way	minimum of once during or for construction within 2 years of issuance for MLA reviews and within 5 years of issuance for FLMPA reviews; then in the 20 <sup>th</sup> year after issuance and every 10 years thereafter	nonuse of right-of-way or violation of right-of-way grant stipulations	require compliance with right-of-way grant stipulations with possible suspension and/or termination for noncompliance or nonuse
<b>MINERALS Oil and Gas</b>	Geophysical Notice of Intent (NOI)	area-wide	line or area inspection	operations conducted in compliance with NOI	minimum of once during operations	violation of regulations, change from approved Notice of Intent, unnecessary or undue degradation	require operator to follow NOI
	Geophysical Notice of Completion (NOC)	area-wide	line or area inspection	operations conducted in compliance with NOC	minimum of once during plugging, once after reclamation	violation of regulations, change from approved NOC unnecessary or undue degradation	require operator to correct violation
	Application for Permit to Drill (APD)	area-wide	site inspection	operations conducted in compliance with Application for Permit to Drill	minimum of once and as necessary	violation of regulations, change from approved Application for Permit to Drill	issue an incidence of noncompliance (INC) with timeframe to correct or shut-in drilling operations
	Sundry Notice	area-wide	site inspection	operations conducted in compliance with Sundry Notice	as necessary	violation of regulations, change from approved Sundry Notice unnecessary or undue degradation	issue an INC with timeframe to correct

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	natural gas	area-wide	drainage evaluation	radius of drainage	as needed	if gas drainage is occurring, there would be a communitization agreement, drilling of protective wells on federal lands, or different spacing, to protect the federal minerals from drainage	certified letter to lessee requiring protection, compensation royalty, relinquishment
	produced water disposal	area-wide	site inspection	operations conducted in compliance with permit	minimum of once annually or as necessary	violation of regulations, change from approved permit, unnecessary or undue degradation	issue an INC with timeframe to correct or shut-in operations
	spill	area-wide	site inspection	area cleaned up, reclaimed	minimum of once after event and as necessary	violation of regulations, change from approved permit, unnecessary or undue degradation	issue an INC and operator cleanup required
	plugged, abandoned wells	area-wide	site inspection	operations conducted in compliance with permit	minimum of once during operations	violation of regulations, change from approved permit, unnecessary or undue degradation	issue an INC correction required
	abandoned well reclamation	area-wide	site inspection	operations conducted in compliance with permit	minimum of once and as necessary until reclamation complete	violation of regulations, change from approved permit, unnecessary or undue degradation	issue an INC/certified letter requiring proper operator rehabilitation
<b>PALEONTOLOGY</b>	significant paleontological localities, ACECs	area-wide	inspection of area disturbed	degradation caused by human or natural activities that lead to loss of significant fossil resources	once yearly	loss or damage to significant fossil resources	closure of areas surrounding site to prevent further disturbance to significant fossil resources
<b>RECREATION</b>	general recreation use	area-wide with emphasis on dispersed use of undeveloped recreation sites	area inspections to look for vandalism, resource abuse, and install photo points	site condition	biannual (June and October); photograph annually	user conflicts, resource degradation, or safety hazards	avoid location of oil and gas facilities in undeveloped recreation sites having concentrated use, and coordinate timing of exploration activities to minimize conflicts during peak periods of use

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SOILS	concentrated recreation use	special recreation management areas, sites with recreation facilities	visitor registration, traffic counters estimates, photo points	visitor days, site condition	visitor registration boxes, counters checked once monthly at the minimum, weekly or biweekly during heavy use periods, photograph annually	increased visitor use per year or sustained use that requires additional or improved facilities	avoid location of oil and gas facilities in developed recreation sites having concentrated use, and coordinate timing of exploration activities to minimize conflicts during periods of use
		area-wide commercial, competitive activities	administrative review, site inspection for complexes with permit stipulations	permit stipulations, resource condition success of reclamation	on site during competitive events, periodic site inspection for commercial operations, administrative review annually	irreparable resource damage, compromise of visitor safety, recreation experience	avoid location of oil and gas facilities in areas where know commercially permitted recreation activities are occurring and coordinate timing of exploration activities to minimize conflicts during peak periods of use
	soil erosion, uplands	area-wide where management activities are occurring or expected to occur	visual observation and surveyed erosion pins	soil loss in tons per acre	site will be visually examined quarterly. Where erosion is deemed excessive, measurements of site characteristics will be taken to determine rate of soil loss.	visual evidence of rill, gully, or sheet erosion. Loss of soil exceeding 10 tons per acre	report exceedance to BLM, MDEQ, or EPA. If caused by CBM discharge or activities, enforcement action will be taken.
	soil erosion, streambank, and floodplain	area-wide along rivers and tributaries where management activities are occurring or expected to occur	visual observation and surveyed erosion pins	area effected in square feet or acres	site will be visually examined quarterly. Where streambank erosion is deemed excessive, measurements of site characteristics will be taken to determine soil loss.	a 10% increase in streambank loss	report exceedance to BLM, MDEQ, or EPA. If caused by CBM discharge or activities, enforcement action will be taken.

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VEGETATION	soil salinization	area-wide where management activities are occurring or expected to occur	visual observation, measurement of soil characteristics such as pH, EC, SAR	area effected in square feet or acres	site will be visually examined quarterly. Where salinity levels show an increase because of vegetation or soil effects, measurements of site characteristics will be taken to determine salinity levels.	a 20% increase in conductivity levels	report exceedance to BLM, MDEQ, or EPA. If caused by CBM discharge or activities, enforcement action will be taken.
	compaction	areas effected by extraction activities	penetrometer or visual inspection	pounds per square inch	1 to 2 times yearly	10% increase in density	limit or block access to compacted sites
	ecological status	areas affected by disturbance through the pre-production, production, post-production processes	ecological site method in key areas	composition, production compared to potential natural community for each site	pre-development ecological status baseline data	status is reduced by 15% or a drop in class	ecological site integrity will be altered to increase status of ecological site index by 15% or an increase in ecological class
Noxious Weeds	trend	areas affected by disturbance through the pre-production, production, post-production processes	any suitable methods as described in TR 4400-4 or the National Range Handbook	apply to the technique selected, may include number of individuals per unit area, percent cover, percent frequency, or percent species composition	every 3 to 5 years after the collection of ecological status baseline data	a change in the direction of trend away from management	measure implementation of action put forth to mitigate reduction of ecological status using techniques listed in monitoring appendix for vegetative trend
	trend	areas affected by disturbance through the pre-production, production, post-production processes	Montana Noxious Weed Standards	acres, plants per square feet, species	yearly (through post production reclamation)	10% increase beyond objectives for the area/new species occurrence or infestation	operators will be required to contain and suppress noxious weeds. Conservation measures will be required in noxious weed sites to decrease population of noxious weeds and increase population of native plant community

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<b>Riparian/Wetlands</b>	condition, trend, age class structure, streambank alteration	any federal action (including split estate)	photo plot, estimate key areas by sight inspection, Cole Browse Method, Key Forage Method, other methods found in Technical References (TR4400-3, TR4400-4, TR4400-7, TR1737-3, TR1737-8, TR1737-9) including MRWA (Montana Riparian Wetland Association) Riparian Inventory for areas not previously inventoried MRWA PFC on inventory areas	percent species composition, percent in each age class, percent utilization, height, percent of the streambank	based on activity plan schedule- a minimum of once every 5 years	trend away from objective or when no improvement occurs, in unsatisfactory habitat condition/functioning at risk with downward trend	oil and gas operators will be required to alter activities in order to provide environmental factors for increasing functionality or habitat conditions of the streams/wetlands. Oil and gas operators may be required to develop replacement wetlands in order to compensate for overall loss of wetlands according to Section 404 of Clean Water Act.
<b>Special Status and Threatened and Endangered (T&amp;E) Plant Species</b>	condition	areas affected by disturbance through the pre-production, production, post-production processes	Montana Natural Heritage Program and visual inspection	presence and condition	once during the growing season, at a minimum	downward trend in plant condition caused by oil and gas activities	oil and gas operators will be required to alter their activities in order to benefit environmental factors required by special status or T&E plant species
<b>WILDLIFE (see also “Wildlife Outline” following the Table)</b>							
<b>Aquatic Biological Diversity (flora/fauna)</b>	population diversity	intermittent/perennial streams associated with produced water discharge	stream sampling	diversity index	every 3 years	downward trend overall stream biological diversity	reduction or elimination of untreated produced water into drainage or watershed
<b>Big Game</b>	seasonal habitat use	project area plus 1-mile buffer	air/ground field inspection	occupancy	annually	downward trend in habitat occupancy	extension of timing stipulations or conditions of approval, off-site habitat management or enhancement
<b>Black-footed Ferret</b>	occupancy	prairie dog towns larger than 80 acres located within 0.5 mile of proposed activity	ground inspection	occupancy	determined on a site-specific basis in coordination with U.S. Fish and Wildlife Service (FWS)	habitat decline or prairie dog fatalities caused by oil and gas activities - occupancy of black-footed ferrets would be managed in a Black-Footed Ferret Management Plan	no incidental take; reinstate consultation if new information shows it may be effected

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<b>Burrowing Owl</b>	active nest locations	specific project area plus 0.5-mile buffer (within active prairie dog town)	ground inspection	occupancy	twice yearly (June to August)	human-caused disturbance to owls related to oil and gas activities such as vandalism and harassment	extension of timing and/or increase of distance from nest; stipulations or conditions of approval
<b>Grey Wolf</b>	occupancy	Billings RMP area	air/ground field surveys	number of sitings	annually until reintroduction objectives are met	1- to 3-year downward trend in production or occupancy	no incidental take; reinstitute consultation if new information shows it may be effected
<b>Migratory Non-game Birds</b>	occupancy	project area plus 0.25-mile buffer	ground observations	occupancy	periodically	documented fatalities caused by oil and gas activities	refinements in infrastructure planning (project plans), implementation of travel corridors, enhanced reclamation standards, and off-site habitat management or enhancement
<b>Mountain Plover</b>	active nest locations	specific project area plus 0.5-mile buffer (within areas less than 4-inch average vegetation height and prairie dog towns)	ground inspection	occupancy	twice yearly (April 15 to June 30)	human-caused disturbance to mountain plovers related to oil and gas activities such as vandalism and harassment	BLM received an exemption from the prohibitions of Section 9 of ESA regarding take by agreeing to terms and conditions in biological opinion (BO). Incidental take of habitat and individuals allowed up to level stated in BO. Take must be monitored. Reinitiation of Section 7 will occur before allowable take is exceeded.
<b>Prairie Dog</b>	active prairie dog colony	specific project area plus 0.5-mile buffer	air/ground inspection	occupancy	annually	documented prairie dog fatalities caused by oil and gas activities	establishment of no surface occupancy zones and/or establishment of timing restrictions within prairie dog towns

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<b>Raptors</b>	active nest locations (excluding burrowing owls)	project area plus 1-mile buffer	air/ground field inspection	number of nests	every 3 years	downward trend in occupancy	extension of timing and/or increase in distance from nest; stipulations or conditions of approval
	raptor productivity (including Burrowing owl)	active nests within 1-mile of project disturbance plus 1-mile buffer	air/ground field inspection	nest success/failure species productivity	annually	downward trend in nest success, overall productivity	extension of timing and/or increase in distance from nest; stipulations or conditions of approval
	raptor productivity-selected undeveloped comparison area	project area	air/ground field inspection	nest success/failure species productivity	every 5 years	information used as support to determine downward trend	extension of timing and/or increase in distance from nest; stipulations or conditions of approval
<b>Sage Grouse</b>	sage grouse lek location	CBM overall project area	aerial field inspection	number, location of leks	every 5 years	downward trend in habitat occupancy	extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation
	sage grouse lek attendance	specific project development areas plus 2-mile buffer	air/ground field inspection	number of males/lek	annually	downward trend in lek attendance	extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation
	sage grouse winter habitat	project area plus 2 mi. buffer	air/ground field inspection	occupancy	annually	downward trend in habitat occupancy or quality caused by oil and gas activities	extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation
<b>Special Status Species (BLM and Montana Natural Heritage Program lists)</b>	occupancy	specific project area plus 1-mile buffer	ground field inspection	occupancy	annually at a minimum via species habitat requirements	downward trend in habitat occupancy or quality caused by oil and gas activities	establishment of timing and/or distance from breeding area through stipulations or conditions or approval

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Threatened, Endangered and Proposed Species other than previously described	occupancy, productivity	CBM overall project area	air/ground field inspection	occupancy	determined on a site-specific basis in coordination with FWS	habitat decline or fatalities caused by oil and gas activities; occupancy of species would be managed in a site-specific Management Plan	reinitiate section and consultation with FWS

# REGIONAL-SCALE MONITORING OF POTENTIAL EFFECTS OF COAL BED METHANE DEVELOPMENT ON WATER RESOURCES

Prepared by the Technical Advisory Committee for the Powder River Basin Controlled Groundwater Area

## Introduction

Coal bed methane (CBM) is released from coal seams by pumping groundwater from coal seams to lower ground water pressures. The coal seams targeted for CBM development in the Powder River Basin constitute important regional aquifers that provide water for domestic, livestock, agricultural, and industrial uses. Consequently, CBM production will probably affect existing water uses in the Powder River Basin, although the extent and magnitude of effects are difficult to predict.

The Montana Board of Oil and Gas Conservation (MBOGC) requires, through its Order No. 99-99, that CBM producers submit field development plans that include groundwater characterization and monitoring. In addition to complying with existing MBOGC rules for wildcat gas wells, CBM producers are required to describe baseline hydrologic conditions, to inventory existing wells and springs, to offer water mitigation agreements to existing water users, and to monitor water production and shut-in water pressures within coal bed methane fields. Water mitigation agreements must be offered for a minimum of one-half mile (expanded to one mile in Mont. Code Ann. 85-2-521) from CBM fields or greater distances if effects extend farther. The U.S. Environmental Protection Agency (EPA) requires monitoring under permits for Class V injection wells used to re-inject water produced during CBM production. Specific requirements of Class V injection permits may include monitoring of injection pressure, injection rate and total volume at injection wells, and ground water elevations in monitoring wells.

There are no clear regulatory requirements for monitoring effects to ground water levels or spring flows outside the one-mile minimum specified by MBOGC or the area affected by Class V injection wells. Groundwater monitoring conducted by CBM producers within and near CBM fields, as required by MBOGC or the U.S. EPA, will not reveal broad regional effects. Therefore, regional-scale monitoring needs to be conducted outside areas of potential CBM development to allow potential effects to be evaluated before, during, and after the period of CBM production. In addition, the spacing of monitoring sites and the

frequency of monitoring needs to be sufficient to distinguish potential effects attributed to CBM development from potential effects attributed to other water users, and from ambient/seasonal variations in ground water levels and spring flows.

The purpose of this document is to establish design criteria for a regional-scale monitoring program intended to detect potential effects of CBM development on existing water uses. The objectives of the regional scale monitoring program are to characterize baseline hydrologic conditions, detect changes in ground water levels and flows from springs attributable to CBM development, and verify recovery of ground water levels after CBM development ends. Regional-scale monitoring of wells and springs is intended to augment and compliment field-scale monitoring established under MBOGC Order No. 99-99 or EPA UIC Class V injection well permits.

Criteria for selecting locations and spacing for monitoring sites, consisting of wells and springs, and monitoring practices are proposed here to ensure that long-term monitoring is sufficiently comprehensive to detect effects that CBM development might have on ground-water systems. Priorities are proposed to coordinate monitoring with the pace of development and the need to evaluate potential effects, and recommendations are presented for implementing monitoring and managing monitoring data. The criteria and monitoring recommendations described below are not meant as rigid rules, but rather are intended to guide qualified personnel in selecting monitoring locations and implementing monitoring that meet the objectives stated above.

The BLM, at its discretion, will administer the regional-scale monitoring program, while operators will be responsible for all in-field monitoring. The BLM has a commitment to maintaining the water monitoring of the PRB region, similar to their continued (25+ years) funding of the MBMG for coal mine water monitoring. The BLM will also partner with operators for in-field monitoring when federal gas is produced.

## Criteria and Monitoring Practices

The portion of the Powder River Basin underlain by coals of the Tongue River Member of the Fort Union Formation is generally considered to have potential for CBM development. Within this area, however, CBM is less likely to be developed from coal seams with limited thickness and ambient ground water pressures; conditions that indicate limited potential for gas production. These areas, located primarily within 2 to 5 miles of coal outcrops, should be targeted for monitoring wells.

The Anderson-Dietz, Canyon, Wall, and Knobloch are the four primary coal seams within the Tongue River Member (Map 1). Separate monitoring sites located within 5 miles of the outcrops of each of these coal zones are proposed. Clusters of wells will be completed in different coal zones where outcrop areas overlap and, where present, springs will be monitored near each monitoring site. Monitoring wells will need to be completed in alluvial aquifers, in areas where water from CBM production is discharged to surface impoundments, or in selected sandstone aquifers within coal outcrop areas or CBM fields (when not required by MBOGC or the U.S. EPA). Springs that are current, historical, or potential sources of water but located away from established monitoring sites may also be monitored.

The focus of overall monitoring of the potential effects of CBM development will change as CBM fields mature, and gas production declines and eventually ends. Monitoring performed by CBM operators that is required by MBOGC or the U.S. EPA, will gradually be discontinued as portions and eventually all of fields are played out. Abandoned producing wells or monitoring wells within CBM fields should be incorporated into the regional monitoring program as field mature, in order to effectively monitor post-production groundwater recovery in affected areas.

The need for detailed information, and the cost of installing monitoring wells and monitoring ground water-levels and spring flows, will need to be balanced to determine the ultimate spacing between monitoring sites. At a minimum, one monitoring site will be located in every township that lies within 5 miles of the outcrop of a targeted coal. The ultimate spacing of monitoring sites might be greater, depending on site-specific conditions such as thickness of coal zone and importance of coal or sandstone aquifers, and priorities for monitoring outlined below.

Monitoring wells may be newly constructed wells, existing monitoring or water supply wells, or abandoned or transferred CBM production wells. Ground-water levels in monitoring wells and flows of springs will need to be measured monthly to obtain a sufficient data record to characterize patterns of seasonal changes in ground-water level or spring flows, before the wells or springs can be effected by CBM development. Typically two to three years of monitoring record is desirable. Monitoring frequency should be reduced once a sufficient record of baseline conditions is established.

## Priorities

The following priorities are proposed for initiating monitoring and selecting monitoring well density and frequency, to ensure that a regional ground water monitoring program is established in advance of anticipated CBM development and before potential effects of CBM development can occur.

- *Sequence of CBM development*—Areas most likely to be affected by CBM development first are the highest priority for initiating monitoring. CBM development is expected to focus initially on the Anderson-Dietz coal zone and, therefore, monitoring near its outcrop should begin first. Records of exploration wells, pipeline plans, and identification of prospective coal zones can provide more specific information regarding the sequence of CBM development.
- *Extent of water use*—Areas where water from coal-beds is heavily used are high priorities for monitoring. Within the general area of the Anderson-Dietz outcrop, areas of concentrated water use, such as the headwaters of Otter Creek, will need immediate and more intensive monitoring.
- *Proximity to political boundaries*—Monitoring should be established along political boundaries, specifically the Montana-Wyoming border and reservation boundaries, in order to detect potential effects from areas outside the regional monitoring network.
- *Sensitivity or hydrogeologic setting*—More intensive monitoring will be necessary where faulting or complex stratigraphy result in complex hydrogeologic settings.
- *Existing monitoring networks*—Monitoring should be re-established at monitoring wells near operating coal mines and coal mining prospects

studied in the past. New monitoring well construction should focus on areas where wells are not available.

- *Land or mineral ownership*—Monitoring should be conducted at sites with stable land and/or mineral ownership. For example, federally owned land, or other land with long-term access easements provide more reliable long-term access for monitoring.

## Implementation and Data Management

An important goal of the proposed regional monitoring program is to ensure that all monitoring data collected are made readily accessible to the public. The regional monitoring program can, and probably will, be conducted by more than one agency, with funding from various sources. However, one agency or interagency will need to coordinate or review all regional monitoring activities in order to assure that monitoring occurs where needed and to prevent duplication. Data from field-scale monitoring pursuant to MBOGC Order 99-99 and EPA UIC Class V injection well permits will need to be managed similarly. A further responsibility of the lead agency or group should be to ensure that regional- and field-scale monitoring data are compiled and made available to the public in the Ground-Water Information Center (GWIC) and the National Resource Information Systems (NRIS).

## Summary of Recommendations

A regional-scale monitoring program is necessary to characterize baseline hydrologic conditions, to detect potential effects resulting from CBM development, and to verify recovery of ground water levels after the period of CBM development. The following constitutes the main elements of a regional-scale monitoring program that should accomplish these objectives:

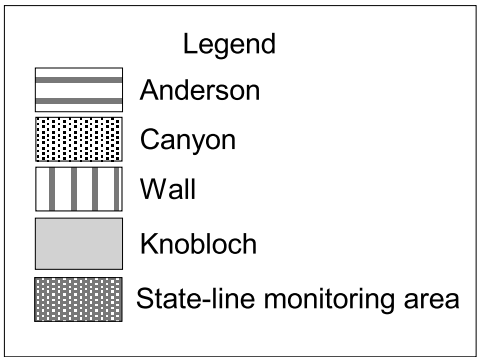
- Monitoring is needed to augment and compliment field-scale monitoring established under MBOGC Order No. 99-99 and EPA UIC Class V injection permits.

- Groundwater levels need to be measured in wells in coals and overlying or underlying sandstone aquifers at locations near coal outcrops outside of areas of prospective CBM development.
- Groundwater levels need to be measured in wells in alluvial aquifers in areas where water CBM production is discharged to surface impoundments, or selected sandstone aquifers within CBM fields.
- Flows from springs need to be monitored when they are near well monitoring sites or if they are important water sources.
- Groundwater levels need to be measured in abandoned or transferred CBM wells as CBM fields mature.
- Monitoring sites need to be located in every township near coal outcrops at a minimum.
- Groundwater levels in wells and flows from springs need to be measured monthly to characterize ambient seasonal patterns.
- Monitoring sites need to be established to ensure that the regional monitoring program is implemented in advance of localized CBM development and, consequently, that potential effects can be detected.
- One oversight agency or interagency group responsible for collecting and compiling comprehensive and consistent data should implement the proposed regional monitoring program.
- Monitoring data need to be compiled and made available to the public through GWIC and NRIS.

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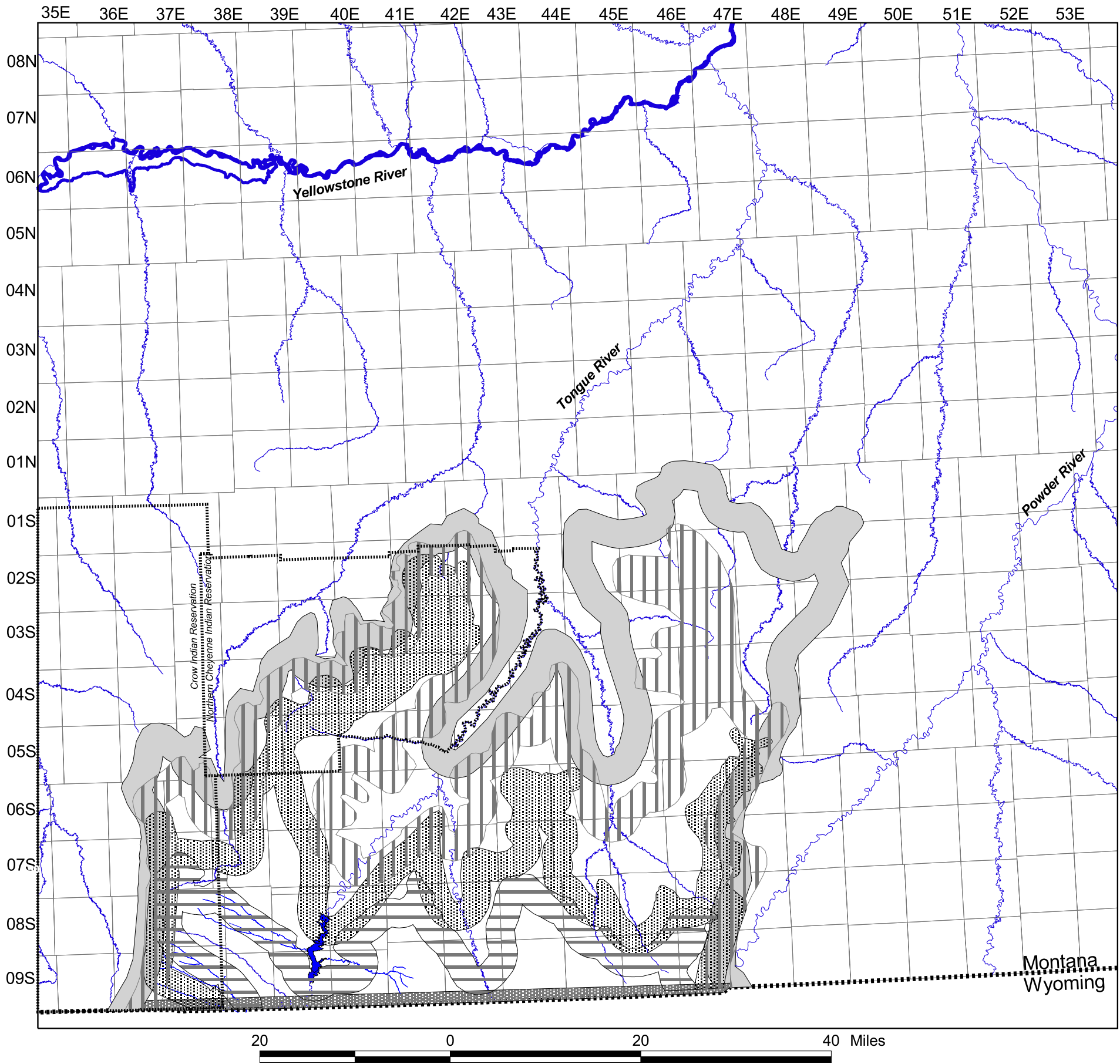
Monitoring Appendix  
Map 1.  
Conceptual map showing  
recommended areas for  
a regional-scale coal-bed  
methane monitoring program

Montana Department of Natural Resources  
Technical Advisory Committee for the Powder River  
Basin Controlled Ground-Water Area



This map is part of a report prepared by the Montana Department of Natural Resources, Technical Advisory Committee for the Powder River Basin controlled ground-water area, titled: Regional-scale monitoring of potential effects of coal bed methane development on water resources. The Technical Advisory Committee proposes a minimum of 1 monitoring site in each township within three - five miles of coal outcrops. In addition, monitoring is proposed near the Montana-Wyoming border.

The Anderson, Canyon, Wall and Knobloch coal seams are the four primary seams within the Tongue River Member of the Fort Union Formation in the Montana portion of the Powder River Basin. Shaded zones represent areas that are generally 3 miles or less from these respective coal outcrops. Separate ground-water monitoring sites are proposed within each of these coal zones to study the potential effects of coal-bed methane development. Actual site locations will be based on detailed geology and field conditions.



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